

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LINDA MIGLIORI, FRANCIS J. FOX,)	
RICHARD E. RICHARDS, KENNETH)	
RINGER, and SERGIO RIVAS,)	
)	
Plaintiffs,)	Civ. No. 5:22-cv-00397
)	
v.)	
)	
LEHIGH COUNTY BOARD OF)	
ELECTIONS,)	
)	
Defendant.)	
)	

PLAINTIFFS' OBJECTIONS TO REPORT AND RECOMMENDATION

Plaintiffs Linda Migliori, Francis J. Fox, Richard E. Richards, Kenneth Ringer, and Sergio Rivas, submit the following objections to the Magistrate Judge's Report and Recommendation (Doc. 101) on Plaintiffs' Motion for Attorneys' Fees.

1. Plaintiffs object to the recommended reductions in hours worked because Defendant Lehigh County Board of Elections ("the Board") did not meet its burden of challenging the requested fees with sufficient specificity to give Plaintiffs notice of the challenge.
2. Plaintiffs object to the recommended reductions in hours worked because the recommended reductions are not based on factors raised by the Board.
3. Plaintiffs object to recommended reductions in hours worked that are based on arbitrary hours "per page" rates for preparing documents, without regard to the type of document or complexity of issues addressed. Further, the Board never raised the issue of Plaintiffs' requested hours being unreasonable based on an "hours per page" analysis.

4. Plaintiffs object to recommended reductions in hours based on separation of time “drafting” and time “editing” or “revising” documents, rather than considering time as a whole to prepare documents.

5. Plaintiffs object to the recommended denial of fees requested for litigating Plaintiffs’ motion for fees, because the Court did not provide Plaintiffs with an opportunity to submit evidence in support of those requested fees.

6. Plaintiffs object to the recommended reduction in hourly rates for attorneys Walczak and Schneider from \$750 to \$725.

7. Plaintiffs objects to the recommended conclusion that Allentown is the relevant community for determining reasonable hourly rates.

Respectfully submitted,

Dated: June 2, 2025

s/Richard T. Ting
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CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, the foregoing document is being filed via the Court's CM/ECF system, which will serve all parties of record via electronic notice of filing, and make the document available for viewing and downloading.

Dated: June 2, 2025

s/Richard T. Ting